U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Deferiet Paper Mill RV2 - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #2**
Stabilization of Abandoned Containers
Deferiet Paper Mill RV2
A26F
Deferiet, NY
Latitude: 44.0391100 Longitude: -75.6807500

To: Catherine McCabe, US EPA

From: Joel Petty, On-Scene Coordinator
Date: 8/3/2017
Reporting Period: 7/22/17 - 7/28/17

1. Introduction

1.1 Background

Site Number:	A26F	**Contract Number:**	EP-S2-15-01
D.O. Number:	TO39	**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	7/13/2017	**Start Date:**	7/11/2017
Demob Date:		**Completion Date:**	
CERCLIS ID:	NYD002229269	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

An emergency Removal Action is warranted based on compromised containers, spilled material, unsecured access to the Site and analytical data indicating the presence of hazardous substances.

1.1.2 Site Description

The facility is located at 400 Anderson Avenue, Deferiet, New York and encompasses approximately 48 acres with a series of buildings that housed the former paper mill and a hydroelectric power-plant. The original mill manufactured paper of varying types, including newsprint and glossy magazine paper. The hydroelectric power-plant was built by the mill to generate steam which supplied electrical power for the machinery as well as the facilities. The paper mill has been abandoned since the mid-1980s, and with the exception of the power plant, is in a severe state of disrepair. In March 2016, EPA performed an emergency response at the site in order to stabilize asbestos-containing material (ACM) along an easement that is used by the employees at the power plant on the property. In June 2017, EPA conducted an assessment for additional ACM throughout the site buildings to determine eligibility for a removal action. During the assessment, abandoned drums and containers were discovered at two locations on the site.

1.1.2.1 Location

The Site is located at 400 Anderson Avenue in Deferiet Village, New York 13628. The coordinates for the Site are latitude 44.03918056, longitude -75.68388889. Residential properties border the Site to the north, northwest, west, and southwest. Over 200 people live in the neighborhood bordering the Site. The Site is an abandoned paper mill and the buildings are in various states of deterioration.

1.1.2.2 Description of Threat

More than 100 containers including two 4,500-gallon tanks, 60 55-gallon drums, 16 300-gallon totes, and numerous smaller containers were found abandoned on the property. It was observed that several of these containers have holes, are bulging and leaking contents onto the ground. EPA sampled a variety of the containers located on-site and discovered that many contained hazardous substances. Hazard categorization indicated that incompatibles are collocated, which could mix if the contents leaked. The roof throughout the building is damaged leaving the containers exposed to the weather elements. The nearest residential properties are located directly across the street to the north and west. The facility is not secure. Fencing around the facility has been damaged in certain areas allowing trespassers access to the property. The buildings that the containers are in are not closed off and are easily accessed. Graffiti on the walls throughout the buildings indicate that trespassing has occurred.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The United States Environmental Protection Agency (“EPA”) was conducting an assessment on asbestos throughout the Site buildings in June 2017 and discovered containers of unknown origin and content. From June 19 through 21, 2017, EPA conducted an assessment of the abandoned drums, totes, tanks, and other containers that were abandoned on the property. Approximately two tanks, 16 totes, 58 drums, as well as various containers 5-gallons or less in size, were found in various states of deterioration. None of the containers were in shippable condition and some were dented and/or bulging. Some of the containers were devoid of tops or were missing bungs leaving them exposed to the elements. One of the totes was on its side and its contents were leaking out onto the floor. Hazard categorization indicated that incompatibles are collocated, which could mix if the contents leaked. The roof throughout the building is damaged leaving the containers exposed to the weather elements. The nearest residential properties are located directly across the street to the north and west. The facility is not secure. Fencing around the facility has been damaged in certain areas allowing trespassers access to the property. The buildings that the containers

are in are not closed off and are easily accessed. Graffiti on the walls throughout the buildings indicate that trespassing has occurred. Hazard categorization of all accessible containers was conducted and select containers were sampled based upon the results of the hazard categorization. Analytical results of the samples indicated the drums and other containers contain CERCLA designated hazardous substances. Based on these results, the Site was determined to be eligible for an emergency Removal Action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On July 11, 2017, a request for approving the use of funds to commence mitigation activities was submitted. The Emergency and Remedial Response Division (ERRD) Acting Director verbally approved a $282,000 ceiling, of which $200,000 is for mitigation purposes. Following the monetary approval, an Emergency and Rapid Response Services (ERRS) contractor was selected and notified. The ERRS Response Manager (RM) contacted the OSC and discussed mobilization to the Site along with needed personnel and resources. ERRS began incurring costs on July 11, 2017, to perform the removal action. Assets were to be deployed the following day with arrival to the Site on July 13th.

2.1.2 Response Actions to Date

See previous PolRep for responses actions taken prior to July 22, 2017.

On July 24, 2017, ERRS completed tote pumping activities using a double diaphragm pump. All pumping continued in Level B. By the end of the day ERRS had pumped totes 007, 008, 011, 012, 013, and 014. ERRS attempted to pump Tote 002 by mixing the contents with water but the sludge was too thick. Tote 010 is a black, rubbery solid material and was also unable to be pumped. Totes 015 and 089 were empty and did not require pumping. The totals for drums generated during tote pumping activities are as follows: Tote 001 (2 waste), Tote 002 (2 waste/water mix), Tote 003 (3 waste and 1 rinse), Tote 004 (5 waste and 1 rinse), Tote 005 (1 waste), Tote 006 (4 waste and 2 rinse), Tote 007 (7 waste and 1 rinse), Tote 008 (6 waste and 1 rinse), Tote 009 (5 waste and 3 rinse), Tote 011 (4 waste), Tote 012 (5 waste and 1 rinse), Tote 013 (6 waste and 1 rinse), and Tote 014 (6 waste and 1 rinse). RST continued oversight, documentation, and air monitoring activities throughout the week. Air monitoring is being performed with 5 gas multi-RAEs set to monitor for volatile organic compounds, hydrogen cyanide, hydrogen sulfide, oxygen, and lower explosive limit.

On July 25, 2017, ERRS began tank pumping activities using a double diaphragm pump. Sodium hydroxide from Tank 107 (about 1/3 full 4,500 gallon tank) was pumped from the tank located in the boiler room to drums located outside along the easement. A chemist was on-site to complete hazard categorization and assessment activities as well as plan for the T&D sampling. ERRS rearranged the 55-gallon drums in the secured area to allow easier access. RST and EPA assisted with the collection of samples from all totes, as well as drums that were inaccessible during the initial assessment.

On July 26, 2017, ERRS completed tank pumping activities from Tank 107. A total of 15 drums were generated (14 sodium hydroxide solution and 1 rinse). Tank 108 was determined to be empty (during the assessment, it was less than 1/4 full of an acidic liquid thought to be residual sulfuric acid mixed with rain water and debris; tank labelled sulfuric acid). ERRS began pumping activities from a small tank (110) and plastic garbage can (111) that contained waste oils. ERRS completed pumping 110 and generated 2 drums. ERRS moved Drum 109 from the boiler room to the secured area of the garage. The chemist completed hazard categorization and assessment activities and continued planning for T&D sampling. RST collected 6 waste samples for cyanide (Containers 004, 006, 007, 009, 038, and 059) and 1 for RCRA characteristics (Container 009).

On July 27, 2017, ERRS completed pumping Container 111 and generated 1 drum. ERRS decontaminated all equipment including the double diaphragm pump, the pump hoses, and the Level B lines. ERRS moved an acetylene cylinder that was found in the boiler room to the secured area of the garage. ERRS moved smaller containers into secured area. ERRS moved emptied totes with potential cyanide crystals into secured area. The totes that are stored in the secured area are 002, 004, 006, 009, 010, and 011. All generated waste is being stored in the secured area of the garage. Pickup of rental equipment began. RST collected soil samples from six locations within a trench in the garage. The garage building and the site was secured at the end of the day.

On July 28, 2017, ERRS and RST temporarily demobilized from the Site. Pickup of rental equipment was completed. The next mobilization will be for disposal sampling.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has identified Deferiet Development LLC as the owner of the facility. Contact with the owners occurred on January 27, 2017 and March 1, 2017. The two principals of Deferiet Development LLC claimed to no longer own the property, however a search of public records indicate they do. On May 11, 2017, Jefferson County received an Order granting an incident of temporary ownership for performance of an environmental restoration investigation. The County granted Site access to EPA on May 17th.

On January 10, 2017, the Preliminary PRP Search was completed.

2.1.4 Progress Metrics

This information will become available during T&D operations.

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

The response will be conducted in two phases. The first phase will be securing the building where the waste is being stored and the stabilization of the hazardous wastes. The second phase will be the transportation and disposal (T&D) of the waste.

2.2.1.1 Planned Response Activities

Securing the building will consist of installing boards over all windows and locks on all entrance doors. Stabilization will consist of both pumping and overpacking. Liquids from the totes and tanks will be pumped into new poly drums for disposal. Solid materials will have to be manually transferred into drums. The materials from the abandoned drums will either be transferred to a new poly drum or overpacked in an 85-gallon steel drum depending on the materials. Materials will be bulked where appropriate, as determined by an ERRS chemist. The smaller containers will be placed into cubic yard boxes for disposal. All emptied totes and drums will be cut and/or crushed and disposed of. All wastes will be shipped off-site for disposal. Air monitoring will occur during all stabilization activities.

2.2.1.2 Next Steps

ERRS and RST will mobilize to the Site the week of August 21, 2017, to conduct disposal sampling as well as plan for upcoming work. EPA will continue to work to gain access for the removal of wastes from the Site.

2.2.2 Issues

High levels of hydrogen cyanide gas has been detected during pumping operations. ERRS performed all tote pumping activities in Level B. RST provided continuous air monitoring during all activities. RST collected samples for cyanide analysis and preliminary results are due on August 11, 2017. High levels of cyanide could lead to more expensive disposal costs than anticipated.

2.3 Logistics Section

All logistics will be handled and monitored by the appropriate contractor or agency.

2.4 Finance Section

2.4.1 Narrative

On July 11, 2017, the ERRD Acting Director approved a verbal authorization for the amount of $282,000, of which $200,000 is for the mitigation contractor.

2.5 Other Command Staff

2.5.1 Safety Officer

The EPA OSC is in charge of overall safety at the Site. The ERRS RM has been designated as the Site safety officer. A Health and Safety Plan was generated by ERRS.

2.5.2 Liaison Officer

The EPA OSC is performing the activities of a Liaison Officer. The OSC is coordinating operations between the ERRS contractor(s) and the local officials. Meetings with Village Officials and the public will be coordinated with the OSC.

2.5.3 Information Officer

Michael Basille is the designated Community Involvement Coordinator for the Site and can be reached at 716-551-4410.

EPA prepared a fact sheet and disseminated it to local officials and Deferiet Village residents.

3. Participating Entities

3.1 Unified Command

Unified Command has not been set up for this site.

3.2 Cooperating Agencies

NYSDEC, Jefferson County, and Deferiet Village

4. Personnel On Site

EPA: 1
1 OSC

ERRS: 6
1 Response Manager
1 Field Cost Accountant
1 Equipment Operator
2 Field Technicians
1 Chemist

RST: 1

5. Definition of Terms

No definition of terms at this time.

6. Additional sources of information

No additional sources of information at this time.

7. Situational Reference Materials

No situational reference materials at this time.